

1 JASON M. FRIERSON  
United States Attorney  
2 MINA CHANG  
Assistant United States Attorney  
3 United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100  
4 Las Vegas, Nevada 89101  
Tel: (702) 388-6336  
5 Fax: (702) 388-6787  
mina.chang@usdoj.gov  
6

7 GUSTAV W. EYLER  
Director  
8 TIMOTHY FINLEY  
DANIEL ZYTNICK  
Trial Attorneys  
9 U.S. Department of Justice  
Consumer Protection Branch  
10 PO Box 386  
Washington, DC 20044  
11 Tel: (202) 307-0050, (202) 598-8337  
Fax: (202) 514-8742  
12 timothy.t.finley@usdoj.gov  
daniel.e.zytnick@usdoj.gov  
13 *Attorneys for the United States*

14 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

15  
16 UNITED STATES OF AMERICA,

2:19cr-00295-GMN-NJK

17 Plaintiff,

**STIPULATION**

18 v.

19 MARIO CASTRO et al.,

20 Defendants.

21  
22 IT IS HEREBY STIPULATED AND AGREED by and between the UNITED STATES  
23 OF AMERICA and the defendants MARIO CASTRO, SALVADOR CASTRO,  
24

1 MIGUEL CASTRO, and JOSE LUIS MENDEZ, through their attorneys, that the  
2 following exhibits are authentic pursuant to Federal Rule of Evidence 902(11):

- 3 1. The records contained in Government Exhibit 101 (Bates-stamped AB-BOA-  
4 00000003 through AB-BOA-00170010, and signature cards and record certification)  
5 are true and correct copies of Bank of America records for the following accounts.
  - 6 a. Golden Products Service Inc., account number ending in ("ANEI") 0333;
  - 7 b. Golden Products Service Inc., ANEI 0346;
  - 8 c. Golden Products Service Inc., DBA Imperial Award Services, ANEI  
9 4866;
  - 10 d. Golden Products Service Inc., DBA Montgomery Marketing Inc., ANEI  
11 1212;
  - 12 e. Golden Products Service Inc., DBA MMI, ANEI 1254.
- 13 2. The records contained in Government Exhibit 102 (Bates-stamped GOV2314-BOA-  
14 00199882 through GOV2314-BOA-00617429, and record certifications) are true and  
15 correct copies of Bank of America records for the following accounts.
  - 16 a. Digital Express, Inc., ANEI 9160, ANEI 9296, ANEI 8522;
  - 17 b. Mario Castro, DBA Digital Express, Inc., ANEI 9283;
  - 18 c. Advanced Allocation Systems, Inc., DBA Distribution Reporting  
19 Services, ANEI 1339;
  - 20 d. Advanced Allocation Systems, Inc., DBA Pacific Disbursement  
21 Reporting, ANEI 8428;
  - 22 e. Secure Data Service, Inc., DBA Pacific Data Awards, ANEI 9540;
  - 23 f. Salvador Castro, ANEI 6703;
  - 24 g. Special Money Managers, Inc., ANEI 9193;

- 1        h. Global Data Funding, Inc., ANEI 4736;
- 2        i. Global Data Funding, Inc, ANEI 1634;
- 3        j. Pacific Allocation Systems, Inc., ANEI 6983;
- 4        k. PI Printing Corp., DBA Assets Unlimited, ANEI 7115;
- 5        l. PI Printing Corp., DBA Money Securities, ANEI 7128;
- 6        m. Marketing Image Direct, Inc., DBA Price Awards, ANEI 1646;
- 7        n. Advanced Allocation Systems, Inc., DBA Distribution Reporting  
8              Services, ANEI 1808;
- 9        o. Digital Express, Inc., DBA Tierra Produce, ANEI 8535;
- 10       p. Mario Castro, DBA Digital Express, Inc., ANEI 4609;
- 11       q. Special Money Managers, Inc., ANEI 5581;
- 12       r. Special Money Managers, Inc., ANEI 9193;
- 13       s. Funding Managers, Inc., ANEI 0411;
- 14       t. Funding Managers, Inc., ANEI 0424;
- 15       u. Advanced Allocation Systems, Inc., DBA Distribution Reporting  
16              Services, ANEI 7977;
- 17       v. Marketing Image Direct, Inc., ANEI 3881;
- 18       w. Marketing Image Direct, Inc. ANEI 1073;
- 19       x. PI Printing Corp., ANEI 3942;
- 20       y. PI Printing Corp., ANEI 3955.

21       3. The records contained in Government Exhibit 103 (Bates-stamped GOV2314-BOA-  
22              00617430 through GOV2314-BOA-00631583, and record certification) are true and  
23              correct copies of Bank of America records for the following accounts.

- 24       a. Golden Product Service, Inc., ANEI 0346;

- 1        b.     Golden Product Service, Inc., DBA MMI, ANEI 1254;
- 2        c.     Golden Product Service, Inc., DBA Imperial Award Services, ANEI
- 3                  4866.

4        4. The records contained in Government Exhibit 104 (Bates-stamped GOV2314-BOA-  
5                  00631584 through GOV2314-BOA-00649803, and record certification) are true and  
6                  correct copies of Bank of America records for the following accounts.

- 7        a.     NSD Products, Inc., DBA NSD Printing, ANEI 8098;
- 8        b.     Advanced Allocation Systems, Inc., DBA Pacific Disbursement  
9                  Reporting, ANEI 8428;
- 10      c.     Distribution Reporting Center, Inc., ANEI 3925;
- 11      d.     Special Money Managers, Inc., ANEI 9193;
- 12      e.     Global Data Funding, Inc., ANEI 4736;
- 13      f.     Pacific Allocation Systems, Inc., ANEI 6983;
- 14      g.     PI Printing Corp., DBA Assets Unlimited, ANEI 7115;
- 15      h.     Marketing Image Direct, Inc., DBA Price Awards, ANEI 1646.

16        5. The records contained in Government Exhibit 105 (Bates-stamped GOV2314-BOA-  
17                  00700606 through GOV2314-BOA-00700647, and record certification), are true and  
18                  correct copies of Bank of America online login records for the following accounts.

- 19      a.     Golden Products Service, Inc., ANEI 0346;
- 20      b.     Golden Products Service, Inc., DBA Imperial Award Services, ANEI:  
21                  4866;
- 22      c.     Golden Products Service, Inc. DBA Montgomery Marketing Inn., ANEI:  
23                  1212;
- 24      d.     Golden Products Service, Inc., DBA MMI, ANEI:1254;

- 1 e. North American Disbursement Agency, Inc., ANEI: 3868;
- 2 f. North American Disbursement Agency, Inc., ANEI: 7709;
- 3 g. Patti A. Kern Michael K. Kern, ANEI: 4394;
- 4 h. Patti A. Kern Michael K. Kern, ANEI: 8227;
- 5 i. Andrea N. Burrow, ANEI: 1943;
- 6 j. Andrea N. Burrow, ANEI: 2894;
- 7 k. Andrea N. Burrow or James D. Burrow, ANEI: 4777;
- 8 l. Marvel M. Warren Andrea N. Burrow, ANEI: 0535;
- 9 m. Andrea N. Burrow in Trust for Ashley N. Burrow, ANEI: 0326;
- 10 n. Andrea N. Burrow James D. Burrow, ANEI: 9111;
- 11 o. Andrea N. Burrow James D. Burrow, ANEI: 9124;
- 12 p. Andrea N. Burrow, ANEI: 4570;
- 13 q. Pacific Allocation Systems, ANEI: 6983;
- 14 r. Special Money Managers, Inc., ANEI: 9193;
- 15 s. Advanced Allocation Systems, Inc., DBA Pacific Disbursement  
16 Reporting, ANEI: 8428;
- 17 t. Advanced Allocation Systems, Inc., DBA Distribution Reporting  
18 Services, ANEI: 7977;
- 19 u. Digital Express Inc., ANEI: 9160;
- 20 v. Digital Express Inc., ANEI: 9296;
- 21 w. Digital Express Inc., ANEI: 8522;
- 22 x. Digital Express Inc. DBA Tierra Produce, ANEI: 8535;
- 23 y. Distribution Reporting Center Inc., ANEI: 3925;
- 24 z. Distribution Reporting Center Inc., ANEI: 8100;

- 1 aa. Secure Data Service Inc., DBA Pacific Data Awards, ANEI: 9540;
- 2 bb. Global Data Funding Inc., ANEI: 4736;
- 3 cc. Global Data Funding Inc., ANEI: 1634;
- 4 dd. PI Printing Corp. DBA Assets Unlimited, ANEI: 7115;
- 5 ee. PI Printing Corp., ANEI: 3942;
- 6 ff. PI Printing Corp., ANEI: 3955;
- 7 gg. Marketing Image Direct, Inc. DBA Price Awards, ANEI: 1646;
- 8 hh. NSD Products, Inc. DBA NSD Printing, ANEI: 8098;
- 9 ii. NSD Products, Inc. DBA NSD Printing, ANEI: 9771;
- 10 jj. NSD Products, Inc. DBA NSD Printing, ANEI: 9784;
- 11 kk. Salvador Castro, ANEI: 6703;
- 12 ll. Kern and Associates, ANEI: 1136;
- 13 mm. Kern and Associates General Acct., ANEI: 2630;
- 14 nn. Your Bag of Goodies, Inc. DBA Ablegenics General Account, ANEI:
- 15 0223;
- 16 oo. Funding Managers, Inc., ANEI: 0411.

17 6. The records contained in Government Exhibit 106 (Bates-stamped GOV2314-BOA-  
18 00649806 through GOV2314-BOA-00685003, and wire records and record  
19 certification) are true and correct copies of Bank of America records for the  
20 following accounts.

- 21 a. Digital Express Inc., ANEI 9160;
- 22 b. Digital Express Inc., ANEI 9296;
- 23 c. Golden Products Service Inc., ANEI 0346;

- d. Advanced Allocation Systems, Inc., DBA Pacific Disbursement Reporting, ANEI 8428;
- e. Salvador Castro, ANEI 6703;
- f. Special Money Managers Inc., ANEI 9193;
- g. Global Data Funding Inc., ANEI 4736;
- h. Pacific Allocation Systems, Inc, ANEI 6983;
- i. PI Printing Corp. DBA Assets Unlimited, ANEI 7115;
- j. PI Printing Corp. DBA Money Securities, ANEI 7128;
- k. Marketing Image Direct DBA Price Awards, ANEI 1646;
- l. Digital Express Inc., ANEI 8522;
- m. Digital Express Inc. DBA Tierra Produce, ANEI 8535;
- n. Golden Products Service Inc., DBA Imperial Award Services, ANEI 4866;
- o. Golden Products Service Inc., DBA MMI, ANEI 1254;
- p. PI Printing Corp., ANEI 3942.

7. The records contained in Government Exhibit 107 (Bates-stamped GOV2314-BOA-00703496 through GOV2314-BOA-00715923, and record certification) are true and correct copies of Bank of America records for the following accounts.

- a. Digital Express Inc., ANEI 9296;
- b. Salvador Castro, ANEI 6703;
- c. Global Data Funding Inc., ANEI 4736;
- d. PI Printing Corp. DBA Assets Unlimited, ANEI 7115;
- e. PI Printing Corp. DBA Money Securities, ANEI 7128;
- f. Marketing Image Direct, Inc, DBA Price Awards, ANEI 1646;

1 g. Digital Express, Inc., ANEI 8522;

2 h. Digital Express Inc. DBA Tierra Produce, ANEI 8535;

3 i. PI Printing Corp., ANEI 3942.

4 8. The records contained in Government Exhibit 108 (Bates-stamped GOV2314-BOA-  
5 00685670 through GOV2314-BOA-00695009, including record certification) are  
6 true and correct copies of Bank of America records for the following accounts.

7 a. MKI Services Inc., DBA Silver Products, ANEI 7701.

8 9. The records contained in Government Exhibit 109 (Bates-stamped GOV2314-BOA-  
9 00695190 through GOV2314-BOA-00696208, including record certification) are  
10 true and correct copies of Bank of America records for the following accounts.

11 a. Mario Castro / Irma Castro, ANEI 5315.

12 10. The records contained in Government Exhibit 110 (Bates-stamped GOV2314-BOA-  
13 00696212 through GOV2314-BOA-00698721 and GOV2314-BOA-00700494  
14 through GOV2314-BOA-00700586, and record certification) are true and correct  
15 copies of Bank of America records for the following accounts.

16 a. Mario Castro, Irma Castro, ANEI 5315;

17 b. Mario Castro, ANEI 5900;

18 c. Mario Castro Primary Account, ANEI 3842;

19 d. New Generation Graphics, ANEI 6126;

20 e. Miguel A. Castro, ANEI: 9853 (Prev 0849).

21 11. The records contained in Government Exhibit 111 (Bates-stamped GOV2314-  
22 JPMC-00000161 through GOV2314-JPMC-00048020, and record certifications) are  
23 true and correct copies of JPMorgan Chase records for the following accounts.

24 a. Platinum Awards Service, Inc., ANEI 1882;

- 1        b.     Secure Data Service Inc., ANEI 2291;
- 2        c.     Direct Advertising Inc., DBA RGR, DBA OBA WCM, DBA DAI,
- 3                  ANEI 2521;
- 4        d.     National Price Service Inc., ANEI 4652;
- 5        e.     National Price Service Inc., DBA Price Review Center, ANEI 6038;
- 6        f.     MKI Services Inc., DBA Silver Products, ANEI 8055;
- 7        g.     Promotional Marketing Solutions Inc., ANEI 9452.

8        12. The records contained in Government Exhibit 112 (Bates-stamped GOV2314-  
9                  JPMC-00049191 through GOV2314-JPMC-00049593 and GOV2314-JPMC-  
10                00049608 through GOV2314-JPMC-00049680, and record certification) are true  
11                and correct copies of JPMorgan Chase records for the following accounts.

- 12        a.     Marketing Image Direct Inc., ANEI 2910;
- 13        b.     Marketing Image Direct., Inc., ANEI 3883;
- 14        c.     Marketing Image Direct., Inc., ANEI 5072.

15        13. The records contained in Government Exhibit 113 (Bates-stamped GOV2314-  
16                JPMC-00051511 through GOV2314-JPMC-00052818 and GOV2314-JPMC-  
17                00053077 through GOV2314-JPMC-00053481, and record certifications) are true  
18                and correct copies of JPMorgan Chase records for the following accounts.

- 19        a.     Jose L. Mendez, ANEI 0281, 8666;
- 20        b.     Maria Castro, ANEI 1569;
- 21        c.     Maria Castro or Carolina Castro, ANEI 5237;
- 22        d.     Maria Castro, ANEI 0686, ANEI 0262, ANEI 5963;
- 23        e.     Miguel Castro, ANEI 6490.

1       14. The records contained in Government Exhibit 114 (Bates-stamped GOV2314-  
2                   JPMC-00055433 through GOV2314-JPMC-00097564, and record certification) are  
3                   true and correct copies of JPMorgan Chase records for the following accounts.

- 4               a.     National Price Service Inc., DBA Price Review Center, ANEI 4652;  
5               b.     National Price Service Inc., DBA Price Review Center, ANEI 6038.

6       15. The records contained in Government Exhibit 115 (Bates-stamped GOV2314-USB-  
7                   00000122 through GOV2314-USB-00000903, and record certification) are true and  
8                   correct copies of US Bank records for the following accounts.

- 9               a.     Maria P. Castro, ANEI 0923, ANEI 1602, ANEI 0004, ANEI 2058,  
10                   ANEI 4200, ANEI 5228, ANEI 5236, ANEI 7298, ANEI 7818, ANEI  
11                   9199, ANEI 5228;  
12               b.     Henderson Foods Inc., ANEI 1876.

13       16. The records contained in Government Exhibit 116 (Bates-stamped GOV2314-USB-  
14                   00000904 through GOV2314-USB-00002994, including record certification) are true  
15                   and correct copies of US Bank records for the following accounts.

- 16               a.     Claudia E. Castro, ANEI 4723, ANEI 2718, ANEI 8521, ANEI 2129,  
17                   ANEI 9322, ANEI 5702.

18       17. The records contained in Government Exhibit 117 (Bates-stamped AB-WF-0000001  
19                   through AB-WF-00005928, including record certification at AB-WF-0000001  
20                   through AB-WF-00000002) are true and correct copies of Wells Fargo records for  
21                   the following accounts.

- 22               a.     R&R Gonzales & Associates, ANEI 0667, ANEI 5778, ANEI 5845,  
23                   ANEI 9334;  
24               b.     R&R Gonzales & Associates, DBA R&R Paycheck, ANEI 8049.

1       18. The records contained in Government Exhibit 118 (Bates-stamped GOV2307-WF-  
2       00006741 through GOV2307-WF-00007062, including record certifications at  
3       GOV2307-WF-00006744 through GOV2307-WF-00006745) are true and correct  
4       copies of Wells Fargo records for the following accounts.

- 5       a.      Montgomery Marketing Inc., LLC, ANEI 5392, ANEI 6178, ANEI  
6       8545, ANEI 0725.

7       Respectfully submitted this 24 day of September, 2022.

8       **FOR THE GOVERNMENT**

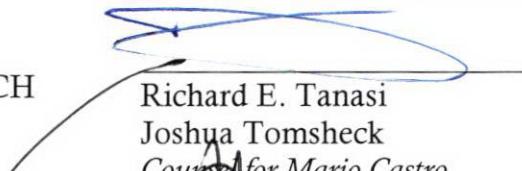
9       U.S. DEPARTMENT OF JUSTICE  
10      CONSUMER PROTECTION BRANCH  
11      GUSTAV W. EYLER  
12      Director

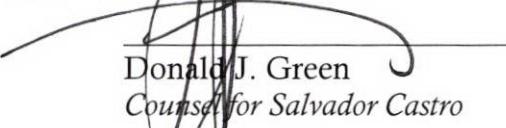
13      U.S. ATTORNEY'S OFFICE  
14      FOR THE DISTRICT OF NEVADA  
15      JASON M. FRIERSON  
16      United States Attorney

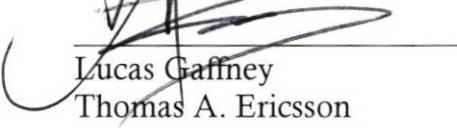
17      /s/ Daniel Zytnick  
18      TIMOTHY FINLEY  
19      DANIEL ZYTNICK  
20      Trial Attorneys

21      MINA CHANG  
22      Assistant United States Attorney

23       **FOR THE DEFENDANTS**

24        
Richard E. Tanasi  
Joshua Tomsheck  
*Counsel for Mario Castro*

25        
Donald J. Green  
*Counsel for Salvador Castro*

26        
Lucas Gaffney  
Thomas A. Ericsson  
*Counsel for Miguel Castro*

27        
Christopher Mishler  
William H. Brown  
*Counsel for Jose Luis Mendez*

28       **ORDER**  
29       IT IS SO ORDERED.

30        
HON. GLORIA M. NAVARRO  
UNITED STATES DISTRICT JUDGE

31      Dated: September 25, 2022